

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
LAFAYETTE DIVISION**

THE STATE OF ARIZONA, By and  
through its Attorney General,  
MARK BRNOVICH; et al.,

PLAINTIFFS,

v.

MERRICK GARLAND in his official  
capacity as Attorney General of the United  
States of America; et al.,

DEFENDANTS.

CIVIL ACTION NO. 6:22-cv-01130

**JOINT MOTION TO EXTEND DISCOVERY DEADLINE**

The Parties respectfully request that the Court extend the discovery deadline in this matter by 60 days, to May 23, 2023. There is good cause for this extension.

Following a status conference on January 17, 2023, the Court ordered the parties to “confer and seek agreement on the parameters of jurisdictional discovery” and set a deadline to complete “the period of jurisdictional discovery” by “March 24, 2023, unless extended.” Dkt. 98. Since then, the Parties have exchanged discovery requests on February 9, 2023, and February 16, 2023. The Parties have been working on responding to these discovery requests, and have conferred on the anticipated time it will take to complete this discovery. The Parties anticipate providing responses and objections to the discovery requests in the next week, but also anticipate that it will take at least another 30 days to identify, collect, review, and produce responsive documents. Accordingly, the Parties request a 60-day extension to allow the Parties time to receive and review the responses before the close of discov-

ery while leaving time for any additional follow up or depositions that might be necessary once complete responses to written discovery have been received. This extension will also allow time to resolve any disputes related to third-party discovery requests. *See, e.g.*, Dkt. 114.

Accordingly, the Parties jointly request that the Court extend the deadline to complete jurisdictional discovery to May 23, 2023.

Dated: March 21, 2023

Respectfully submitted,

By: /s/ Joseph S. St. John

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Dated: March 21, 2023

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on March 21, 2023, I electronically filed this motion with the Clerk of the Court for the United States District Court for the Western District of Louisiana by using the CM/ECF system. Counsel in the case are registered CM/ECF users and service will be accomplished by the CM/ECF system.

/s/ Brian C. Ward  
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